1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	NORTHERN DISTRICTION AND APPLE INC., Plaintiffs, v. FORTRESS INVESTMENT GROUP LLC, FORTRESS CREDIT CO. LLC, UNILOC 2017 LLC, UNILOC USA, INC., UNILOC LUXEMBOURG S.A.R.L., VLSI	DISTRICT COURT ICT OF CALIFORNIA Case No. 3:19-cv-07651-EMC STIPULATION AND [PROPOSED] ORDER REGARDING THE SEALING OF THE COURT'S ORDER GRANTING DEFENDANTS' MOTION TO DISMISS WITH LEAVE TO AMEND
	Defendants.	
21		
23		
24		
25		
26		
27		
28	Case No. 3:19-cv-07651-EMC	STIPULATION AND [PROPOSED] ORDER REGARDING SEALING OF COURT'S ORDER

1	Pursuant to the Court's July 7, 2020 Orde	er Granting Defendants' Motion to Dismiss with	
2	Leave to Amend ("the Order"), Plaintiffs Intel Corporation and Apple Inc. (collectively,		
3	"Plaintiffs") and Defendants Fortress Investment	"Plaintiffs") and Defendants Fortress Investment Group LLC, Fortress Credit Co. LLC, Uniloc	
4	2017 LLC, Uniloc USA, Inc., Uniloc Luxembourg S.a.r.l., VLSI Technology LLC, Inventergy		
5	Global, Inc., INVT SPE LLC, DSS Technology Management, Inc., IXI IP, LLC, and Seven		
6	Networks, LLC (collectively, "Defendants") hereby request and stipulate as follows:		
7	WHEREAS, on July 7, 2020, this Court temporarily filed under seal the Order (Dkt. 187);		
8	WHEREAS, in the Order, the Court instructed the parties to meet and confer to determine		
9	what parts, if any, of the Order should remain under seal and submit a joint stipulation and		
10	proposed order regarding sealing within one week of the date of the Order (Dkt. 187 at 41);		
11	WHEREAS, on July 9, 2020, the parties met and conferred pursuant to the Order;		
12	WHEREAS, the parties agree that no portion of the Order should remain under seal;		
13	IT IS HEREBY STIPULATED AND AGREED by and between the parties, subject to the		
14	Court's approval:		
15	1. The Court's July 7, 2020 Order Granting Defendants' Motion to Dismiss with		
16	Leave to Amend shall be filed publicly.		
17	IT IS SO STIPULATED.		
18	Dated: July 14, 2020	Respectfully submitted,	
19			
20	A. Matthew Ashley (Bar No. 198235)	By: <u>/s/ Mark D. Selwyn</u> Mark D. Selwyn (SBN 244180)	
21	mashley@irell.com IRELL & MANELLA LLP	mark.selwyn@wilmerhale.com WILMER CUTLER PICKERING	
22	840 Newport Center Drive, Suite 400 Newport Beach, CA 92660-6324	HALE AND DORR LLP 950 Page Mill Road	
23	racsiline. 949 700-3200	Palo Alto, CA 94304 Telephone: (650) 858-6000	
24	TORTRESS IN VESTMENT GROUP	Facsimile: (650) 858-6100	
25	LLC, FORTRESS CREDIT CO. LLC, VLSI TECHNOLOGY LLC	William F. Lee (admitted pro hac vice)	
2627	/s/ Martin Flumenbaum Martin Flumenbaum (pro hac vice) mflumenbaum@paulweiss.com	william.lee@wilmerhale.com Joseph J. Mueller (admitted pro hac vice) joseph.mueller@wilmerhale.com Timothy Syrett (admitted pro hac vice)	
28	Case No. 3:19-cv-07651-EMC	STIPULATION AND [PROPOSED] ORDER REGARDING SEALING OF COURT'S ORDER	

1	PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP	timothy.syrett@wilmerhale.com WILMER CUTLER PICKERING
2	1285 Avenue of the Americas New York, NY 10019-6064	HALE AND DORR LLP 60 State Street
3	Telephone: (212) 373-3191 Facsimile: (212) 492-0191	Boston, MA 02109 Telephone: (617) 526-6000
4	Counsel for Defendants FORTRESS INVESTMENT GROUP	Facsimile: (617) 526-5000
5	LLC, FORTRESS CREDIT CO. LLC	Amanda L. Major (pro hac vice)
6	/s/ James J. Foster	amanda.major@wilmerhale.com Leon B. Greenfield (pro hac vice)
7	James J. Foster jfoster@princelobel.com PRINCE LOBEL TYE LLP	leon.greenfield@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP
8	One International Place, Suite 3700 Boston, MA 02110	1875 Pennsylvania Avenue, N.W. Washington, DC 20006
9	Telephone: 617 456-8022 Facsimile: 617 456-8100	Telephone: (202) 663-6000 Facsimile: (202) 663-6363
10	Counsel for Defendant UNILOC 2017 LLC	Counsel for Plaintiffs
11	/s/ Daniel. R. Shulman	INTEL CORPORATION and APPLE INC.
12	Daniel R. Shulman (pro hac vice) Shulman & Buske PLLC	
13	126 North Third Street, Suite 402 Minneapolis, MN 55401	
14	Telephone: 612 870 7410 dan@shulmanbuske.com	
15	Counsel for Defendants UNILOC LUXEMBOURG S.A.R.L.	
16	UNILOC USA, INC	
17	<u>/s/ Dean C. Eyler</u> Dean C. Eyler (<i>pro hac vice</i>)	
18	dean.eyler@lathropgpm.com LATHROP GPM LLP	
19	500 IDS Center 80 South 8th Street	
20	Minneapolis, MN 55402 Telephone: 612 632-3335	
21	Facsimile: 612 632-4000 Counsel for Defendants	
22	UNILOC LUXEMBOURG S.A.R.L. UNILOC USA, INC	
23	/s/ Christopher A. Seidl	
24	Christopher A. Seidl (<i>pro hac vice</i>) CSeidl@RobinsKaplan.com	
25	ROBINS KAPLAN LLP 800 LaSalle Avenue, Suite 2800	
26	Minneapolis, MN 55402 Telephone: 612 349 8468	
27	Facsimile: 612 339-4181	
28	Counsel for Defendants	STIPULATION AND (PROPOSED

- 2 -

Case No. 3:19-cv-07651-EMC

STIPULATION AND [PROPOSED] ORDER REGARDING SEALING OF COURT'S ORDER

1	INVT SPE LLC INVENTERGY GLOBAL, INC.
2	/s/ Nathaniel Lipanovich
3	Nathaniel Lipanovich (Bar No.
4	292283) nlipanovich@thoits.com
5	THOITS LAW 400 Main Street, Suite 250
6	Los Altos, CA 94022 Telephone: 650 327-4200 Facsimile: 650-325-5572
7	Counsel for Defendant
8	DSS TECHNOLOGY MANAGEMENT, INC.
9	/s/ Jason D. Cassady
10	Jason D. Cassady (<i>pro hac vice</i>) jcassady@caldwellcc.com CALDWELL CASSADY & CURRY
11	2121 N. Pearl Street, Suite 1200 Dallas, TX 75201
12	Telephone: 214 888-4841 Facsimile: 214-888-4849
13	Counsel for Defendant IXI IP, LLC
14	
15	/s/ Samuel F. Baxter Samuel F. Baxter (pro hac vice) sbaxter@mckoolsmith.com
16	MCKOOL SMITH 104 East Houston, Suite 100
17	Marshall, TX 75670 Telephone: 903 923-9001
18	Facsimile: 903 923-9099
19	Counsel for Defendant SEVEN NETWORKS, LLC
20	
21	<u>ORDER</u>
22	Pursuant to stipulation, IT IS SO ORDERED.
23	
24	DATED: July 15, 2020 The Honorable Edward M. Chen
25	United States District Judge
26	
27	
28	STIPULATION AND [PROPOSED]
	Case No. 3:19-cv-07651-EMC ORDER REGARDING SEALING OF - 3 - COURT'S ORDER